



FILED

12-15-15
04:59 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Application of Southern California Edison)
Company (U 338-E) for Approval of the Results) A1512013 Application No. 15-12-XXX
of Its 2015 Preferred Resources Pilot Request for)
Offers)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR
APPROVAL OF THE RESULTS OF ITS 2015 PREFERRED RESOURCES PILOT
REQUEST FOR OFFERS**

WILLIAM V. WALSH
REBECCA MEIERS-DE PASTINO

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6016
Facsimile: (626) 302-6962
E-mail: Rebecca.Meiers.DePastino@sce.com

Dated: **December 15, 2015**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Application of Southern California Edison)	
Company (U 338-E) for Approval of the Results)	Application No. 15-12-XXX
of Its 2015 Preferred Resources Pilot Request for)	
Offers)	

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) APPLICATION FOR
APPROVAL OF THE RESULTS OF ITS 2015 PREFERRED RESOURCES PILOT
REQUEST FOR OFFERS**

Pursuant to Rules 1 and 2 of the California Public Utilities Commission’s (Commission or CPUC) Rules of Practice and Procedure, Sections 701 and 702 of the Public Utilities Code,¹ Section 399.11 *et seq.* (Renewables Portfolio Standard (RPS) Legislation), Section 399.13(g), Decision (D.) 03-06-071, and the 2014 and 2015 RPS Plans, Southern California Edison Company (SCE) submits this Application for Approval of the results of its 2015 Preferred Resources Pilot (PRP) Distributed Generation (DG) Request for Offers (RFO) (Application). SCE’s filing consists of this Application and concurrently served testimony in support of the Application (Exhibit SCE-1) and supporting Appendices to the Testimony (Exhibit SCE-2).²

¹ Unless otherwise noted, all statutory section references are to the California Public Utilities Code.

² SCE will be serving a confidential and public version of Exhibit SCE-2.

I.

INTRODUCTION

In this Application, SCE seeks approval of two Power Purchase Agreements (PPAs) with SunEdison for in front of the meter (IFOM) solar photovoltaic (PV) projects totaling 2.167 MW. These projects will support SCE's Preferred Resources Pilot (PRP) taking place in the Johanna and Santiago substation system area in Orange County (the PRP Region). In undertaking the PRP, SCE is investigating if and how preferred resources will allow SCE to meet local needs at the distribution level and manage or offset projected electricity demand growth from 2013 through 2022 in the PRP Region. If the PRP proves that preferred resources can achieve that goal, SCE may not have to rely on new conventional resources to meet the projected growth, or rely on less new conventional resources than if the PRP were not undertaken. The Commission should grant SCE's application for approval of these two PPAs because they not only meet the goals of the PRP, but also several other important policy objectives.³

As California moves toward a low-carbon future, the State and SCE are increasingly looking to clean sources of energy, or "preferred resources,"⁴ to meet energy and reliability needs. In their planning, state agencies, including the California Public Utilities Commission (CPUC), California Independent System Operator (CAISO), and California Energy Commission

³ Such policy objectives include the Distributed Resources Plan (DRP), the Electric Program Investment Charge (EPIC), Investment Plan's Integrated Grid Project (IGP), Local Capacity Requirements (LCR), and SCE's Renewables Portfolio Standard (RPS) goals.

⁴ The State's Energy Action Plan II, Implementation Roadmap for Energy Policies – joint document adopted by the CEC and the CPUC -- states: "The loading order identifies energy efficiency and demand response as the State's preferred means of meeting growing energy needs. After cost-effective efficiency and demand response, we rely on renewable sources of power and distributed generation, such as combined heat and power (CHP) applications. To the extent efficiency, demand response, renewable resources, and distributed generation are unable to satisfy increasing energy and capacity needs, we support clean and efficient fossil-fired generation." The State's Energy Action Plan II (September 21, 2005) at p. 2, available at: http://www.energy.ca.gov/energy_action_plan/index.html. Energy storage is a potential enabling technology, but is not an identified Preferred Resource by the State.

(CEC), reply upon certain assumptions⁵ about the performance capabilities of preferred resources to address energy and reliability needs. Such needs include those resulting from the 2012 retirement of the San Onofre Nuclear Generating Station (SONGS) and the anticipated retirement of nearby ocean-cooled power plants (a.k.a. once-through cooling (OTC) plants).⁶ To build, maintain, and reliably operate the grid of the future, which will primarily focus on resources that function at the distribution level, SCE must know whether those assumptions are valid. The performance and integrated use of preferred resources as dependable energy sources able to serve load at the local distribution level, however, remains largely untested.

Time is of the essence to acquire that knowledge for many reasons,⁷ not least of which is the time it will take to implement mitigation activities if the assumptions do not materialize. Specifically, SCE needs to know by 2018 if it can acquire, deploy, and measure the performance capabilities of a mix of preferred resources that will meet the approximately 30 megawatts (MW) per year of forecasted load⁸ growth through 2022 in the PRP Region. If so, the use of those preferred resources may defer or eliminate the need for new conventional generation resources in the PRP Region. If the PRP goals can be achieved, SCE may be able to replicate that experience elsewhere as it builds California's 21st century's power grid. To that end, in November 2013 SCE launched the PRP to investigate if and how preferred resources⁹ will allow SCE to meet

⁵ For example, page 42 of "Assessing Local Reliability in Southern California Using a Local Capacity Annual Assessment Tool," CEC-200-2015-004, states: "The scale of future savings expected from such [demand-side] programs in Energy Commission, CPUC, and California ISO electricity planning studies is so large that credible degrees of failure can lead to resources shortfalls large enough to affect local reliability in one or more areas."

⁶ Additional information on OTC retirements is available from the CEC at: http://www.energy.ca.gov/renewables/tracking_progress/documents/once_through_cooling.pdf

⁷ Such reasons include addressing environmental concerns, furthering customer choice, adapting to changing markets, and integrating increasing penetration of intermittent resources.

⁸ SCE's Preferred Resources Pilot, Portfolio Design Report, Revision 0, October 31, 2014, at page 15, available at: https://www.sce.com/wps/wcm/connect/4f89b0a8-e1f8-446f-a975-306db38ec353/PRP_PortfolioDesignReport.pdf?MOD=AJPERES. This report is periodically updated

⁹ For the purpose of the PRP, SCE limited the definition of "preferred resources" to clean resources, such as energy efficiency (EE), Demand Response (DR), renewable distributed generation resources,

local needs at the distribution level and manage or offset projected electricity demand growth from 2013 through 2022 in the PRP Region.

To support the goals of the PRP, SCE has been acquiring and deploying a diverse portfolio of preferred resources. For the most part, SCE has acquired resources through existing acquisition mechanisms and Commission programs. Specifically, SCE has acquired preferred resources to meet the PRP Region needs in SCE's 2013 Local Capacity Requirements (LCR) Request for Offers (RFO) for the Western Los Angeles Basin (LCR RFO),¹⁰ the Solar Photovoltaic Program RFO 4 (SPVP 4)¹¹ and various customer programs.¹²

In November 2014, SCE launched the renewable distributed generation (DG) PRP request for offers solicitation (PRP DG RFO) because existing acquisition mechanisms were unable to supply sufficient quantities of in-front-of-the-meter (IFOM) renewable DG resources. IFOM renewable DG resources are a key component of a diverse preferred resource portfolio because the resources are metered, have time of delivery (TOD) specifications, and have curtailment capabilities.¹³ The table below illustrates the relatively low installation of IFOM DG in the PRP region.

e.g., solar, wind, hydroelectric, as well as energy storage. Unlike the State's Loading Order, SCE's definition of preferred resources does not include any fossil-fired generation.

¹⁰ On November 21, 2014, SCE filed A.14-11-012 for approval of the results of its 2013 LCR RFO for the Western LA Basin. The Commission has approved the contracts in D.15-11-041.

¹¹ SCE filed for approval the results of its SPVP 4 RFO via advice letter Advice Letter 3206-E. The Commission approved 3206-E through disposition on May 12, 2015.

¹² Utility Customer Programs include utility managed EE and DR programs, as well as the California Solar Initiative (CSI) (including the Single and Multi-family affordable solar housing (MASH/SASH programs), Self-Generation Incentive Program (SGIP), New Solar Homes Partnership (NSHP), and Net Energy Metering program.

¹³ When the PRP DG RFO launch in November 2014, SCE anticipated some IFOM energy storage resources for the PRP region in its 201 Energy Storage RFO (ES RFO). However, the RFO did not result in projects being selected in the PRP region.

Preferred Resource Type	PRP Resources as of 10/2015¹⁴ (MW)
EE	36
DR (including permanent load shift)	7.7 ¹⁵
Distributed Generation (behind the meter customer systems)	26.81
Distributed Generation (IFOM systems)	1.4
Energy Storage (behind the meter customer systems)	14
Energy Storage (IFOM systems)	0

To address the lack of IFOM DG in the PRP region, SCE solicited offers for new eligible renewable energy resources (ERR) qualified projects in the PRP DG RFO. In this RFO, SCE sought offers for IFOM DG projects with a minimum size of 250 kW located in the PRP Region. The projects were required to interconnect before December 31, 2017 to a circuit or lower voltage substation connected to either the Johanna A-Bank Substation or the Santiago A-Bank Substation. SCE expressed a preference for projects interconnecting to Johanna Jr. 66/12kV, a B-Bank substation that electrically connects to the Johanna A-Bank substation. All of the eligible offers SCE received were IFOM solar PV projects mounted on a combination of rooftops of existing buildings and on carports constructed by the offeror adjacent to the existing buildings.

Ultimately, SCE executed PPAs with Sun Edison for two projects: Bell Tustin (1,131 kW) and Red Hill (1,036 kW) (collectively the SunEdison Projects). Both are a combination of rooftop/carport installations that interconnect to circuits that are connected to the Johanna substation. The rooftop portions of the installations will be on existing buildings and SunEdison will construct the carport portions in the parking lots adjacent to the respective buildings. The two PPAs associated with these projects have November 23, 2015 execution dates.

¹⁴ The MW amounts reflect the preferred resources acquired through existing mechanisms as of October 30, 2015 with an expected in-service date before 2018. The amounts are approximate because utility program contributions are validated at year end.

¹⁵ When the PRP DG RFO launch in November 2014, 10 MW of DR was anticipated to be delivered from the LCR RFO contracts. The amount of DR, including permanent load shift, currently acquired is 8 MW -- down from 18 MW.

The Commission should grant SCE's application for approval of the Sun Edison Project contracts because they not only meet the goals of the PRP, but also the objectives of several other important policy objectives. First, because the two projects are Distributed Energy Resources (DERs), they will contribute to SCE's DRP demonstration projects.¹⁶ SCE plans to use the PRP Region and the associated resources acquired within this region to support the timely commencement and completion of at least two of the three field demonstration projects provided for in SCE's DRP. The projects will provide valuable information about how SCE should conduct its distribution planning process and invest in its grid to facilitate the integration of increasing penetration of DERs.¹⁷

Second, the Bell Tustin Project, sited in the sub-PRP Region served by Johanna Jr., a B-bank substation,¹⁸ will also provide testing opportunities for the Electric Program Investment Charge (EPIC) Investment Plan's Integrated Grid Project (IGP). In the IGP, SCE seeks to optimize the operation of the grid with higher DER penetration.¹⁹ While the IGP-based distribution upgrades used within this sub-region of the PRP are being funded from the 2012-2014 and the 2015-2017 Investment Plans approved by the Commission,²⁰ the DERs needed for the IGP are acquired separately.

Finally, the two projects are ERRs that will provide portfolio content category 1 (Category 1)²¹ products and contribute toward SCE's long-term RPS procurement need.

¹⁶ SCE DRP A.15-07-002 at p. 97.

¹⁷ SCE's DRP and the associated demonstration projects are subject to R.14.08.013. All matters relevant to the DRP should be addressed in R.14-08-013 and are not part of this contract approval application.

¹⁸ B-bank substations are lower level substations that connect up to the A-bank substations. Johanna Jr. electrically connects to the Johanna A-Bank substation.

¹⁹ A.14-05-005, SCE's Amended Application for Approval of its 2015-2017 EPIC Triennial Investment Plan (May 8, 2014) (EPIC Application), p. 3; see also D.15-04-020, Ordering Paragraph (OP) 1 at p. 61 (approving modified investment plan).

²⁰ See EPIC Application at p. 3; see also D.15-04-020, OP 1 at p. 61.

²¹ As defined in Public Utilities Code § 399.16(b)(1) and D.11-12-052.

II.

THE PRP'S PROCEDURAL HISTORY

In the Long-Term Procurement Plan proceeding (R.12-03-014), the Commission issued D.13-02-015 (Track 1 decision). The Track 1 decision ordered SCE to file a LCR procurement plan. SCE submitted its LCR Procurement Plan (LCR PP) on July 15, 2013, and a modified version on August 30, 2013. In its modified LCR PP, SCE proposed to pursue a pilot to provide “real time, real world”²² experience to reduce uncertainty associated with the application and value of preferred resources and energy storage (ES), and encourage greater participation and use of such technologies. While SCE did not seek approval of its pilot through the LCR PP, it indicated it would limit resources to the vicinity of selected substations most affected by the SONGS retirement. Energy Division approved SCE’s modified LCR PP on September 4, 2013.

The Commission’s March 21, 2013, Revised Scoping Memo in R.12-03-014 initiated Track 4 to consider additional resource needs due to the long-term outage (and later permanent closure in June 2013) of SONGS, Units 2 and 3. On August 26, 2013, SCE filed testimony in Track 4 that provided details on its then named “Preferred Resources Living Pilot Program” to procure and evaluate the ability of preferred resources to meet local energy needs.²³ On March 13, 2014, the Commission issued D.14-03-004 (Track 4 Decision) authorizing SCE to procure between 500 and 700 MW to meet local capacity needs stemming from the retirement of SONGS. The Commission did not rule on the PRP, but noted it is a “promising concept” and that “[t]o the extent that new resources are eventually procured through this effort, we will need to look closely to determine how they interact with other authorization. . . .”²⁴

²² SCE’s 8/30/2013 Track 1 Procurement Plan at p. 58.

²³ See SCE’s 8/26/2013 LTPP Track 4 Testimony at p. 49.

²⁴ D. 14-03-004 (LTPP Track 4 Decision), Finding of Fact (FF) 56 (“SCE’s Living Pilot is a promising concept.”); FF 57 (“The Living Pilot is not being proposed by SCE at this time, therefore it is not possible now to make any determination about its viability or ability to meet LCR needs in the LA Basin.”).

This application seeks approval for the procurement of new resources for the PRP and identifies the relationship to other resources that were acquired through other authorized mechanism. Specifically, the selected SunEdison Projects are consistent with SCE's 2014 and 2015 RPS Procurement Plans and long-term need for renewable energy. Both Plans stated that SCE "continues to solicit ERR Generating Facilities ... that are interconnected to SCE's distribution system in the Johanna and Santiago sub-station area to meet SCE's [PRP] goals."²⁵ The contracts executed as a result of the PRG DG RFO will contribute towards SCE's RPS procurement goals. The selected contracts will provide renewable energy from new solar PV facilities totaling 2.167 MW for 20-year terms, consistent with SCE's long-term need for renewable energy. Because the first point of interconnection of the selected projects will be within the CAISO system, the contracts will provide a Category 1 product.

III.

SUMMARY OF REQUEST

In the PRP DG RFO, SCE executed PPAs associated with two offers from SunEdison for IFOM DG solar PV projects in the PRP Region totaling 2.167 MW. Each project will be mounted on a rooftop of an existing building and on carports that will be constructed adjacent to the existing buildings. The two projects will be located in the City of Tustin and will connect to circuits that feed the Johanna substation. A summary of the selected offers is provided in the table below. SCE is requesting recovery in rates of payments made pursuant to the SunEdison PPAs, subject only to further review with respect to the reasonableness of SCE's administration of the SunEdison PPAs. The selected contracts are eligible renewable resources that will be used to meet SCE's and California's RPS goals.

²⁵ See Southern California Edison Company's (U 338-E) 2015 Renewables Portfolio Standard Procurement Plan, R.15-02-020, August 4, 2015 and Southern California Edison Company's (U 338-E) 2015 Renewables Portfolio Standard Procurement Plan, R.11-05-005, June 4, 2014.

Seller	Project	Generation Type	Size in AC (kW)	Estimated Average Energy (MWh/yr)	Forecasted Commercial Operation Date	Term of Agreement (Years)
SunE RAPID5 222 LLC	Bell Tustin	Rooftop Solar PV	1,131	44,445	December 1, 2016	20
SunE RAPID5 223 LLC	Red Hill	Rooftop Solar PV	1,036	38,131	December 1, 2016	20

SCE respectfully requests that the Commission approve the PRP DG RFO, SCE's conduct with respect to the PRP DG RFO, and the contracts selected through the PRP DG RFO process as prudent and reasonable. The Commission should grant SCE's application for approval of these two PPAs because they not only meet the goals of the PRP, but also the objectives of several other important policy objectives, as discussed above.

IV.

ORGANIZATION OF SCE'S TESTIMONY

Exhibit SCE-01, "Testimony of Southern California Edison Company on the Results of Its 2015 Preferred Resources Pilot Request for Offers (PRP DG RFO)," is organized in a single volume with seven chapters as follows:

- Chapter 1 Introduction
- Chapter 2 The PRP's Procedural History
- Chapter 3 PRP RFO Solicitation Process Overview
- Chapter 4 Offer Valuation Methodology
- Chapter 5 Solicitation Results
- Chapter 6 Consistency with Commission Decisions
- Chapter 7 Role of IE and PRG

Exhibit SCE-02, includes the following Appendices to SCE's Testimony:

- Appendix A: Witness Qualifications
- Confidential/Public Appendix B: Renewable Net Short Calculations

Appendix C-1:	RFO Website Solicitation Materials
Confidential Appendix C-2:	RFO Survey Questions and Responses
Appendix D:	Least-Cost Best-Fit
Confidential Appendix E-1:	Bell Tustin PPA
Confidential Appendix E-2:	Red Hill PPA
Confidential Appendix F-1:	Bell Tustin PPA Redlined to Pro Forma
Confidential Appendix F-2:	Red Hill PPA Redlined to Pro Forma
Confidential Appendix G:	PRP RFO Summary of Selected Offers
Confidential Appendix H-1:	Independent Evaluator Report
Appendix H-2:	Independent Evaluator Report – Redacted
Appendix I	Confidentiality Declaration
Appendix J	Nondisclosure Agreement

V.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory and Other Authority

SCE files this Application pursuant to the Commission’s Rules of Practice and Procedure, Public Utilities Code sections 701 and 702, Section 399.11 *et seq.* (Renewable Portfolio Standard (RPS) Legislation), Section 399.13(g), and the 2014 and 2015 RPS Plans. Specifically, SCE’s Application complies with the Commission’s Rules of Practice and Procedure 1.5 through 1.11 and 1.13, which specify the procedures for, among other things, filing documents. In addition, this Application complies with Rules 2.1 and 2.2. Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified by the applicant. SCE’s Application sets forth the relief sought, the authority for such relief, and has

been verified by an SCE officer as provided in Rules 1.11 and 2.1. Rule 2.1 sets forth further requirements that are addressed separately in the sections below.

B. Legal Name, Principal Place of Business, and Correspondence or Communications

The legal name of the applicant is Southern California Edison Company. SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat, and power in portions of central and southern California as a public utility subject to the jurisdiction of the Commission. SCE's properties, substantially all of which are located within the State of California, primarily consist of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California 91770, and its post office address and telephone number are:

Southern California Edison Company
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1212

Rebecca Meiers-De Pastino is the attorney on this matter. Correspondence or communications regarding this Application should be addressed to:

Rebecca Meiers-De Pastino
Senior Attorney
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6016
Facsimile: (626) 302-6962
E-mail: rebecca.meiers.depastino@sce.com

To request a copy of this Application, please contact:

Jorge A. Martinez, Legal Administrative Assistant
Southern California Edison Company
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3050
Facsimile: (626) 302-1935
E-mail: jorge.martinez@sce.com

C. Categorization, Hearings, Issues to be Considered and Proposed Schedule Pursuant to Rule 2.1(c)

1. Proposed Category

SCE proposes that this proceeding be categorized as a “ratesetting” proceeding as defined in Rule 1.3(e) of the Commission’s Rules of Practice and Procedure and California Public Utilities Code Section § 1701.1(c)(3). In addition, Rule 7.1(e)(2) provides that if a proceeding does not clearly fit within one of the three established categories, the proceeding generally should be conducted under the rule for ratesetting proceedings.

SCE is not proposing specific rate increases at this time, but is seeking approval of all contracts entered into as a result of the PRP DG RFO, including cost recovery for those contracts. SCE proposes to include in its annual Energy Resource Recovery Account (“ERRA”) Forecast proceeding a forecast of the costs of the resources procured through the PRP DG RFO to be included in rates for the following year. The costs of the PRP resources that will be included in rates will be trued-up to their actual recorded costs through balancing accounts.

2. Need for Hearings

SCE’s Application and supporting Testimony and appendices submitted herewith are straightforward and contain sufficient information and constitute a sufficient record for the Commission to rule on SCE’s Application without the need for evidentiary hearings. SCE

believes that all interested parties can comment and express their views in writing through protests and comments.

3. Proposed Expedited Schedule

SCE proposes, and respectfully requests the Commission adopt, the following expedited schedule for this proceeding. The dates in this expedited schedule are required due to the termination clauses contained in the PPAs,

Expedited Schedule

Application Filed	December 15, 2015
Daily Calendar Notice Appears	December 21, 2015
Protests and Responses Due	January 12, 2015
Reply to Protests and Responses Due	January 22, 2015
Prehearing Conference	January 29, 2016
Proposed Decision Mailed	April 4, 2016
Comments on Proposed Decision Due	April, 25, 2016
Reply Comments Due	May 2, 2016
Commission Issues Final Decision	By July 1, 2016

4. Issues to be Considered

The issues to be considered in connection with this Application are specified in SCE's Testimony, the Summary of SCE's Request in Section III above, and the Prayer for Relief set forth in Section VI below.

D. Organization, Qualification to Transact Business and Articles of Incorporation
Pursuant to Rule 2.2

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is incorporated herein by this reference pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, and presently in effect, certified by the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and are by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is by reference made a part hereof

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series J Preference Stock filed with the California Secretary of State on August 19, 2015, and presently in effect, certified by the California Secretary of State, was filed with the Commission on October 2, 2015, in connection with Application No. 15-10-001, and is by reference made a part hereof.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 14, 2014, pursuant to General Order Nos. 65-A and 104-A of the Commission.

E. Requirements That Are Not Applicable

Because this Application does not request authority to increase rates and only seeks approval of the contracts selected through the PRP DG RFO, the requirements of 3.2(a)(1)-(5), (7)-(8), (10) and 3.2(b)-(e) of the Commission's Rules of Practice and Procedure are not applicable.

F. Index of Exhibits and Appendices to This Application

SCE's submissions in support of this Application include the following, which are incorporated herein by reference:

Exhibits to Application

Exhibit SCE-1	Testimony of Southern California Edison Company in Support of Its Application for Approval of Results of Its 2014 Local Capacity Requirements Request for Offers in Moorpark
Exhibit SCE-2	Appendices in support of Testimony

G. Service List

The official service list has not yet been established in this proceeding. SCE is serving this Application and supporting Testimony on the service list established by the Commission for R.13-12-010 (LTTP) and R.15-02-020 (RPS). SCE has also served a copy of this Application and its supporting testimony on the Commission.

VI.

PRAYER FOR RELIEF

SCE respectfully requests that the Commission:

1. Grant expedited consideration of this Application, as the terms of the PRP DG RFO contracts are conditioned on the occurrence of final “CPUC Approval,” as it is described in the PRP DG RFO contracts;
2. Approve the Application in its entirety;
3. Approve the PRP DG RFO, and SCE’s conduct with respect to the PRP DG RFO, as reasonable;
4. Approve the two SunEdison contracts in their entirety;
5. Find the two SunEdison contracts are consistent with SCE’s RPS Procurement Plan;
6. Find the two SunEdison Project contracts compliant with the Emissions Performance Standard;
7. Find that any procurement pursuant to the two SunEdison contracts is procurement from an eligible renewable energy resource for purposes of determining SCE’s compliance with any obligation that it may have to procure eligible renewable energy resources pursuant to the California Renewables Portfolio Standard (Public Utilities Code Section 399.11 et seq.), Decision 03-06-071, or other applicable law;

8. Find the PRP DG RFO contracts, and SCE's entry into them, reasonable and prudent for all purposes, and find that any payments to be made by SCE pursuant to the contracts are recoverable in full by SCE through the ERRA proceeding, subject only to SCE's prudent administration of the contracts;
9. Grant such other and further relief as the Commission finds just and reasonable.

Respectfully submitted,

WILLIAM V. WALSH
REBECCA MEIERS-DE PASTINO

/s/ Rebecca Meiers-De Pastino

By: Rebecca Meiers-De Pastino

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6016
Facsimile: (626) 302-6962
E-mail: Rebecca.Meiers.DePastino@sce.com

December 15, 2015

VERIFICATION

I am an officer of the applicant corporation herein and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of December 2015, at Rosemead, California.

/s/ Colin Cushnie

By: Colin Cushnie
Vice President, Vice President, Energy Procurement &
Management
SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770